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**Special counsel

VIA ECF

Hon. P. Kevin Castel
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Application GRANTED. Initial conference adjourned
from June 13, 2022 to September 9, 2022 at 11:30 a.m.
The conference will proceed telephonically.
Dial-In No.: 1-888-363-4749, Access Code: 3667981.
SO ORDERED.
Dated: 5/2/2022

June 3, 2022

P. Kevin Castel
United States District Judge

RE: Morrison et al v. The City Of New York , et al
21-cv-10647-PKC

Your Honor,

I represent Plaintiff in the above referenced matter. I write on behalf of all parties to request a 60-day extension of time to complete mediation in this matter, and a related adjournment of the initial conference in this matter, currently scheduled for June 13, 2022.

By way of background, Plaintiffs in this matter allege that they were falsely arrested and subjected to excessive force by defendant New York Police Department officers on September 17, 2020. Pursuant to Local Rule 83.10, this matter was referred to the Court's mediation program on December 15, 2022. Mediation was to be held by June 21, 2022.

The parties have been engaged in the limited discovery and the informal settlement negotiation as required by Local Rule 83.10. Myself, defense counsel and the assigned mediator have been attempting to schedule a formal mediation session. However, we have been unable to find a mutually available date for all required parties. Those efforts have been further complicated as defense counsel Assistant Corporation Counsel (ACC) Andrey Udalov is leaving the Office of Corporation Counsel as of June 8, 2022. Accordingly, a date for mediation cannot be set until another ACC is assigned to this matter. As a result, the parties and the mediator agree that an

extension of time is required. We hope that mediation can be scheduled and held by August 22, 2022 and therefore ask for an extension of time to complete mediation until that date.

Related to this request, the parties seek an adjournment of the initial conference scheduled for June 13, 2022 until a date convenient to the Court after the deadline to complete mediation. In the interest judicial economy, the parties seek to engage in the mediation program before entering into a discovery schedule. Moreover, an incoming defense counsel would likely not be prepared to participate fully in a conference so soon after being assigned this matter. Lastly the parties request that the deadline for the proposed case management order be extended until 5 days before the rescheduled initial conference date.

Defense counsel Mr. Udlov consents to these requests.

Thank you for your consideration.

Yours,

A handwritten signature in blue ink, appearing to read "Nicholas Mindicino", with a long horizontal flourish extending to the right.

Nicholas Mindicino
Liakas Law, P.C.